

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

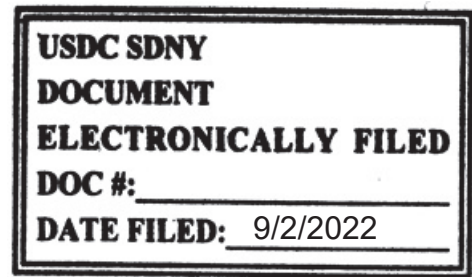
COVET & MANE, LLC,

Plaintiff,

v.

INVISIBLE BEAD EXTENSIONS, LLC,

Defendants.



Case No. 21 Civ. 07740 (JPC)(RWL)

**MOTION TO FILE DOCUMENT
UNDER SEAL**

Pursuant to Rule B of the Rules for Redactions and Filing Under Seal in Appendix A of the Individual Practices in Civil Cases of Robert W. Lehrburger, United States Magistrate Judge, as of September 28, 2021, Plaintiff Covet & Mane, LLC (“Plaintiff” or “C&M”) hereby moves to file a redacted copy of a letter to the Court regarding Plaintiff’s request for a pre-motion conference to address Plaintiff’s proposed motion to amend its First Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2) (the “Letter”).

The reason Plaintiff seeks to file the Letter in redacted form is that Defendant Invisible Bead Extensions, LLC (“Defendant” or “IBE”) has designated the entirety of its document production on August 11, 2022, 8,358 pages of documents, Bates Nos. IBE0002637 – 10,995, as Attorneys’ Eyes Only pursuant to the So-Ordered Confidentiality Agreement, filed on March 3, 2022, as ECF Doc. No. 48. Defendant has also designated the deposition of a third-party witness, Cassadi Currier, and portions of the Fed. R. Civ. P. 30(b)(6) deposition of IBE, and the depositions of IBE’s principals, Tyler Turley and McKenzie Turley, as Attorneys’ Eyes Only pursuant to the So-Ordered Confidentiality Agreement. Since the Letter summarizes certain documents and portions of testimony from these depositions, Plaintiff hereby requests to file a

copy of the Letter with these summaries redacted. Although Plaintiff does not agree with these designations, in an abundance of caution, it seeks to file a redacted version of the Letter. However, we hereby request that the Court allow Plaintiff to file a redacted version of the Letter to permit Defendant to file a letter motion requesting that the material remain under seal and address the reasons for its position pursuant to *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006) and *Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016).

An unredacted copy of the has been sent to Chambers by email and served upon Defendant's counsel. A redacted copy of the Letter is annexed hereto as **Exhibit 1**.

Dated: New York, New York
September 2, 2022

Respectfully submitted,

By: 
Laura-Michelle Horgan

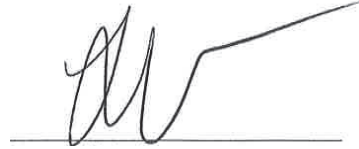
BARTON LLP
711 Third Avenue, 14th Floor
New York, New York 10017
Tel.: (212) 687-6262
Fax: (212) 687-3667
mross@bartonesq.com
lmhorgan@bartonesq.com

Attorneys for Plaintiff
Covet & Mane, LLC

CERTIFICATE OF SERVICE

I certify that on the 9th day of August, 2022, the foregoing was served on all counsel of record via electronic mail.

Dated: September 2, 2022



Laura-Michelle Horgan
BARTON LLP
711 Third Avenue, 14th Floor
New York, New York 10017
Tel.: (212) 687-6262
lmhorgan@bartonesq.com
mross@bartonesq.com

Attorneys for Plaintiff
Covet & Mane, LLC

SO ORDERED:



9/2/2022

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE